Applying EJ Promising Practices to SDWA UIC Permitting

Methodology	Questions
Meaningful Engagement ↓	**Well Injection (Class III & Class V)** • What notice and opportunity for public comment was provided to minority, low-income, and tribal/indigenous populations? • Was personal notice provided? • When was the public informed that injection well draft permits were under consideration? **Aquifer Exemption** • What notice and opportunity for public comment was provided to minority, low-income, and tribal/indigenous populations? • Was personal notice provided? • How were private wells identified? • At what point was the public informed that a draft USDW aquifer exemption would be granted?
Scoping Process ↓	• What efforts have been made at government-to-government consultation with tribal representatives, leaders, or officials?
Defining the Affected Environment ↓	**Well Injection (Class III & Class V)** • What is the horizontal and lateral relationship between the injection zone and the lowermost underground source of drinking water? • What is the affected environment for the authorized injection zone? • What is the area of review for each well? • Have any unique conditions of the potentially affected population been identified, if so, will those unique conditions change the definition of the affected environment? How? **Aquifer Exemption** • What is the affected environment for the aquifer exemption, including but not limited to the lateral extent of the aquifer containing the portion to be exempted? • How is lateral confinement of the injected material documented? • Was lateral displacement of formation fluid caused or allowed by the injection operation considered in the determination of the affected environment?

Methodology	Questions
Developing Alternatives ↓	• Was a "no build" alternative considered? • If so, what weight is given to comments received from the public who support a "no-build" option?
Identifying EJ Populations ↓	• What data sources and other methods that were used to identify minority, low-income and tribal/indigenous populations?
Impacts Analysis ↓	**Well Injection (Class III & Class V)** • Was lateral displacement of formation fluid, caused or allowed by the injection operation, considered in the determination of the affected environment? • What current or former private wells exist in the injection zone? • How were abandoned wells in the affected environment determined? List all sources reviewed? Did these sources indicate the date for which records were made of abandoned wells? • What records exist for plugging and abandonment? • How were abandoned wells plugged and abandoned? • How were abandoned wells in the affected environment determined? • How were those wells plugged and abandoned? **Aquifer Exemption** • What is the volume of injectate that will remain in the exmpted aquifers? • What is the nature of the contaminants that are expected to be injected into the exempted aquifer?

Disproportionately High & Adverse Impacts ↓	• See *Impacts Analysis* questions above and ask whether the potential negative impact could have an disproportionate effect on EJ communities.
Mitigation & Monitoring	**Well Injection (Class III & Class V)** • What is the nature of the confining zone between the injection zone, production zone, and USDW? • How was lateral displacement of formation fluid, caused or allowed by the injection operation, considered in the determination of monitoring procedures? • How will the public be notified of potential risks in the event of a confinement zone breach? • Will the public have access to the monitoring data provided to Region 8 and the state? **Aquifer Exemption** • How were abandoned wells in the affected environment determined? • How were those wells plugged and abandoned? • Is there a plan for remediation of the aquifer in the event that contaminatino occurs to USDW sources and the proposed mitigation measures fail to prevent the spread of that contamination?